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July 27, 1998

U.S. Environmental Protection Agency  
Emergency Response Office  
75 Hawthorne Street  
San Francisco, CA 94105

Ref. No.: T190698-006  
TDD No.: 099804-001  
PAN No.: 0300PPSF-XX

Attention: Karen Nelson, Project Officer

Subject: **Pomona Plating, Site Assessment, Interim Report #2 and Final, Pomona, California****Introduction**

On April 1, 1998, U.S. Environmental Protection Agency (EPA) On-Scene Coordinator (OSC) B. Lewis tasked the Superfund Technical Assessment and Response Team (START) to begin a site assessment investigation of the Pomona Plating facility at 720 Indigo Court, Pomona, California. The EPA investigation activities were initiated in response to a formal request for assistance submitted to EPA by the Los Angeles County Fire Department, Health Hazardous Materials Division (HHMD). The HHMD reported repeated non-compliance with HHMD issued Notices of Violation (NOV's) and concerns regarding possible on-site chemical releases, plating waste storage violations and possible facility abandonment.

On April 2, 1998, the START conducted a drive-by site visit to view external conditions at the Pomona Plating facility. Two roll-off bins, numerous 55-gallon drums, scrap process equipment and debris were seen in the parking lot. The facility was closed and reported fire damage to an exterior wall was not visible in areas accessible to the START vehicle.

On April 3, 1998, the START obtained copies of file records pertinent to the site from HHMD representative P. Biren. Detailed findings associated with these files are reported in "Pomona Plating, Site Assessment, Interim Report #1", submitted on April 10, 1998 under this Technical Direction Document (TDD). This report summarizes those findings and provides an account of the EPA/START site assessment activities which occurred on May 5, 1998.

## **Site Description**

Pomona Plating is located at 720 Indigo Court, Pomona, Los Angeles County, California. The surrounding area is generally zoned for light industrial/commercial use, however, the site shares a common property line with a residential neighborhood directly to the west. The boundaries of the site are generally defined by Towne Street to the east, Yorkshire Street to the west, the Santa Fe railroad tracks on the north, and Arrow Street to the south.

The facility consists of a single approximate 10,000 square foot structure. The building is equally divided between a polishing room /office area and main plating line/wastewater treatment and chemical storage area. The property also contains an approximate 2,500 square foot back lot where plating chemicals and waste are stored. Immediately north of the back lot area is a rail-line and right of way. A large parking lot, serving both Pomona Plating and an adjacent metal machine shop, is located south of the building. Miscellaneous plating debris, various plastic and metal 55-gallon drums, partially burned plastic plating vats, and two covered roll-off bins filled with contaminated debris are located at the western edge of the parking lot (see Attachment A, Figure 1: Site Diagram).

The area encompassing both Pomona Plating and the metal machine shop is enclosed by either wire or concrete block fencing. Access to the parking lot is through a drive-way gate which appears to remain open during business hours. Facility access is accomplished through doors located on the buildings south and east facing walls and through several roll-up bay doors on the north, south, and east sides of the building. Access into the facility can also be made through an unsecured hole on the north facing wall of the structure.

## **Enforcement History**

The following summarizes key enforcement and potentially responsible party (PRP) information as stated by Mr. Biren and/or documented in the HHMD file. More detailed information and document copies are contained in "Pomona Plating, Site Assessment, Interim Report #1", submitted on April 10, 1998 under this TDD.

The current owner of the property, D Distefano, operated a metal finishing business known as JR Electroplating at the location from approximately 1977 to December 1992. From January 1993 to December 1995, business ownership transferred to D. Alvarado and F. Velasco, doing business as Silver Works. From December 1995 to the present, business ownership transferred to J. Sanchez, F. Diaz and J. Castro collectively doing business as Pomona Plating. Mr. Distefano continues to own the property and leases the facility to the Pomona Plating partners.

Each site operator (JR, Silver Works, Pomona Plating) was the subject of numerous verbal directives and written Notices of Violation either from the Los Angeles County Sanitation District (LACSD) for illegal waste discharge or HHMD for non-compliant waste management practices. In July 1997, a fire occurred which damaged several process tanks and left two 3-foot diameter holes in the roof above the main processing area. The record indicates that between the time of this fire and February 1998, at least ten separate HHMD inspections were conducted at Pomona Plating. Each inspection revealed unsatisfactory hazardous waste management practices and housekeeping procedures.

On January 14, 1998, an Administrative Hearing was held at LACSD. The hearing was attended by Messrs. Sanchez and Castro who both stated they are no longer operating the facility or disposing of wastes at the Pomona Plating site. In response, the LACSD voided the facility industrial wastewater discharge permit (# 14197, first issued 3/19/96). The LACSD also required the partners to seal the industrial connection to the sanitary sewer. The industrial connection sealing was verified in subsequent inspections by the LACSD and HHMD, however, the facility itself was found locked and vacant and no repairs to the fire damaged roof had been made. In addition, a large volume of plating chemicals and chemical wastes were located in open vats, roll-off-bins and portable tanks in the back lot and parking lot areas.

On March 3, 1998 a search warrant was executed at Pomona Plating by the HHMD Investigations Unit and the Environmental Crimes Unit of the District Attorneys Office. The investigators collected evidentiary facility records and eleven samples representative of accumulated tank, drum, roll-off-bin and filter cake wastes. Notably, hazardous waste manifest records indicated that the last transport of hazardous waste to an off-site facility occurred in January 1996. Enforcement sample analytical results verified the presence of hazardous waste determining levels of toxic metal constituents and corrosivity characteristic wastestreams. The search warrant acquired evidence is reportedly being used for a criminal proceeding against the Pomona Plating operators.

The search warrant also involved a second facility operated by Mr. Sanchez known as Star Metal Polishing at 1520 Spence Street, Los Angeles, California. Results of this search warrant investigation were not available to the START, however, in a later statement, Mr. Biren indicated that Star Metal Polishing only conducts metal polishing and no plating is conducted at the location.

#### **EPA/START Site Assessment**

On May 5, 1998, OSC Lewis and the START conducted a detailed assessment of the Pomona Plating facility focusing on wastestream inventory, characterization and sampling activities. EPA arranged site access through Mr. Sanchez who agreed to unlock the facility and remain on-site to describe processes and answer questions. In the morning, Mr. Sanchez was accompanied by S. Zarougian of Varia Waste Management (Varia) and J. White of J. White Laboratory & Company. According to Mr. Sanchez, Varia had provided waste disposal services for Pomona Plating in the past and was familiar with the contents of the two roll-off-bins in the

parking lot. Mr. Sanchez introduced Mr. White as the facility chemical and plating consultant. Mr. Biren was also on-site throughout most of the day.

Each of the plating, process and chemical storage areas were assessed separately by the START and are summarized below. Inventory tables listing container type, size, content description and volume are referenced in the summaries and are included in Attachment B.

#### Plating Line (Table 1: Plating Line Inventory)

Each of the 41 vats and drums comprising the plating line were measured and the capacity and content volumes were estimated by START. The START numbered each vat and drum with spray paint and prepared an updated schematic of the plating line (see Attachment A, Figure 2: Plating Line Diagram). Access to each vat and drum is from a raised wooden walkway constructed over the bermed concrete floor. Vat and tank descriptions were provided by either Mr. Sanchez or Mr. White.

Mr. Sanchez described the facility's overall operation as a three step wheel plating process. The items (wheels) are first introduced into a copper-acid plating solution followed by a nickel-acid plate and final chrome-acid plating solution. The majority of the vats and drums represent dragout receptacles for the actual plating baths, acid etching and rinse solutions, and soap rinse solutions. The physical appearance of the content of each vat appeared consistent with the descriptions provided. Mr. Sanchez stated that there were no cyanide plating processes at the facility, although he could not definitively state that there were no cyanide contaminated wastes (drums) on-site from former operators.

The majority of the larger capacity plating vats were at or near capacity. The total estimated quantity of plating line liquids at the time of the assessment was 12, 304 gallons. There was an unquantified volume of sludge accumulated within the bermed plating line area.

#### Wastewater Treatment (Table 2: Wastewater Treatment Inventory)

The facility's wastewater treatment system is located in a separately bermed area immediately west of the plating line (see Attachment A, Figure 3: Wastewater Treatment Diagram). The system is designed for pH adjustment, metals precipitation, clarification and filter press operations.

According to Mr. Sanchez, the system has not been utilized since December 1997. The total estimated quantity of wastewater treatment system liquids at the time of the assessment was 4, 560 gallons. There was an unquantified volume of sludge accumulated within the bermed wastewater treatment area.



Miscellaneous Chemicals Inside Building (Table 3: Misc. Chemicals Inside Building)

The START conducted a gross inventory of non-bulk chemical containers within both the plating room and polishing room. Approximately 16, 55-gallon drums and 24 smaller containers with contents, mostly within the plating room, were encountered. The content of all containers could not be determined, however, most appeared to contain additives or solutions for either the plating line or wastewater treatment system. One poly tank in the plating room contained approximately 400 gallons of contaminated liquids pumped from the outside berm area. This contaminated liquids containment was performed several months earlier under order by the HHMD. A second poly tank in the plating room contained over 2,000 gallons of a waste acid rinse solution. Approximately nine fiber bags of product flocculant were also staged in the plating room.

Eighteen 1-ton fiber woven "supersacks" full of filter cake were inventoried in the polishing room. Each sack was marked with a RCRA hazardous waste mark as "hazardous waste solid, n.o.s., 9, 3087, filter cake". The sheer volume of this filter cake indicates that appropriate off-site disposal had not occurred for some time.

The total estimated quantity of miscellaneous liquid and solid waste inside the building at the time of the assessment was 3,590 gallons and 36,440 pounds, respectively.

Outside Areas (Table 4: Outside Areas Inventory)

The facility's back lot area (see Attachment A, Figure 1) contained 23 bulk volume vats and poly tanks. The START numbered each bulk container with spray paint, recorded measurements and estimated the content volume of each. Neither Mr. Sanchez nor Mr. White provided specific information as to the contents of the back lot bulk storage containers, although Mr. Sanchez indicated that some of the seven poly tanks contained "good plating solutions".

The 16 vats were generally lined up along the northern back lot fenceline. Only one was found to be empty and many were at or near their capacity with solutions. Many of the vats were completely exposed to the elements, while others were only partially covered with pieces of wood or plastic. Only two of the 16 back lot vats were marked with a description ("spent chrome" and good nickel liquid").

Approximately 48, 55-gallon drums with contents were also inventoried in the back lot. The majority of these were full and marked with a RCRA hazardous waste mark as "spent nitric or spent acid, D007". Accumulation start dates present on the marks were dated in late 1997. Several drums had written labels with the wording "chromic waste" and approximately six unopened drums contained product bleach or sodium hydroxide.

The western edge of the parking lot area (see Figure 1) contained miscellaneous scattered debris, fire damaged process equipment and empty vats, metal parts and empty containers. A total of nine full 55-gallon drums of wastewater treatment system additives and cleaning

solutions were also inventoried. Two covered 20 yd<sup>3</sup> roll-off-bins full of contaminated fire debris and floor sweepings were staged at the southern edge of the parking lot.

The total estimated quantity of back lot and parking lot tank, vat and drum liquid wastes and parking lot roll-off-bin solid wastes was 22,068 gallons and 40 yd<sup>3</sup>, respectively. There was an unquantified volume of sludge accumulated within the back lot tanks and vats.

### **EPA/START Sampling and Analysis**

At the conclusion of the inventory operation, the START finalized the specifics of a sampling and analysis effort. Six sampling locations were chosen by OSC Lewis and the START for off-site laboratory analysis based upon the inventory information and limited field chemistry testing as follows:

- |    |                |  |
|----|----------------|--|
| 1. | Sample "PP-1": | A grab sample from a randomly selected unopened supersack of filter cake located in the polishing room.        |
| 2. | Sample "PP-2": | A composite of floor sludge accumulation collected within the bermed area of the wastewater treatment area.    |
| 3. | Sample "PP-3": | A composite of floor sludge accumulation collected within the bermed area at the west end of the plating line. |
| 4. | Sample "PP-4": | A composite liquid sample from two drums marked as "spent nitric (D007)" in the back lot area.                 |
| 5. | Sample "PP-5": | A grab sample from a vat marked as "spent chrome (D007)" in the back lot area (START vat #12).                 |
| 6. | Sample "PP-6": | A composite of soils at property's southern fenceline, down-gradient of plating facility.                      |

These sampling locations were selected in an attempt to document the presence of corrosive wastestreams and wastestreams with state hazardous waste determining levels of total metal constituents. The sampling methods and quality assurance issues relevant to this sampling and analysis activity are addressed in the final Quality Assurance Sampling Plan (QASP) located in Attachment C. The QASP was developed under EPA quality assurance/quality control guidelines for removal activities in conjunction with the Region IX START Quality Assurance Project Plan.

The six samples were delivered to the START subcontracted laboratory for analysis designed to meet the definitive data category as defined in "Data Quality Objectives Process for Superfund, Interim Final Guidance", September 1993, 9355.9-01. To accomplish this, the analytical methods employed for this project were methods approved by EPA.

Summary data results are presented in the table below. Bold face entries denote concentrations in excess of the California Total Threshold Limit Concentration (TTLC) for the listed metal analyte or corrosive samples per the corrosivity characteristic.

<b>START Laboratory Data Summary</b> <b>Analytes Exceeding CA Metals TTLC Levels (mg/kg) and/or Corrosivity Criteria</b> <b>Pomona Plating</b>							
<b>Analyte</b>	<b>PP-1</b>	<b>PP-2</b>	<b>PP-3</b>	<b>PP-4</b>	<b>PP-5</b>	<b>PP-6</b>	<b>TTLC Limit</b>
Chromium	<b>6,640</b>	2,390	148	N/D	<b>117,000</b>	221	2,500
Copper	<b>7,790</b>	1,190	1,360	<b>85,100</b>	<b>5,330</b>	<b>3,560</b>	2,500
Nickel	<b>9,830</b>	838	<b>124,000</b>	<b>32,000</b>	<b>3,060</b>	<b>2,120</b>	2,000
pH units	7.4	10.6	4.4	<1.0	<b>0.65</b>	6.0	N/A

The laboratory data package was validated by START in accordance with "USEPA Quality Assurance/Quality Control Guidance for Removal Activities", OSWER Directive 9360.4-01 for definitive data use objectives and are considered to be usable for the intended purpose. The pH and mercury metal data were accepted without qualifications. Certain metals data were accepted with qualification. The qualification was based on matrix spike/matrix spike duplicate recoveries outside of the acceptable control limits. For those data affected by the above qualifications, the data were qualified "J", which indicates an estimated concentration. The complete EMAX Laboratories, Inc., data summary sheets are contained in Attachment D. The data validation reports and all laboratory raw data are archived in the START TDD files.

Each sample, except PP-2, revealed TTLC hazardous waste determining levels of one or more of the three primary metals used in the Pomona Plating processes (chrome, copper, nickel). Two notable results include the percent level nickel contamination in the plating line floor sludge sample (PP-3) and elevated concentrations of copper and nickel in the southern fenceline soil composite sample (PP-6). The presence of contamination in sample PP-6 suggests that contaminant migration has occurred away from the main building and further study will be required to define the extent of any possible off-site contaminant migration. The two spent acid plating solutions represented by samples PP-4 and PP-5 both revealed low pH corrosivity characteristics.

### **Post-Assessment Action**

OSC Lewis found that the conditions present at Pomona Plating constitute a threat to public health or welfare or the environment based upon a consideration of the factors set forth in the NCP at 40 CFR 300.415(b). These conditions included the storage of hazardous substances and wastes in open drums and vats, exposed vats in deteriorated condition, the presence of large volumes of plating solutions and sludges beneath various tanks and vats at the facility, and an overall lack of building structural integrity.

On May 13, 1998, OSC Lewis prepared Action Memorandum detailing the assessment findings and on May 22, 1998 a CERCLA 106 Unilateral Administrative Order was delivered to the property owner (Mr. Distefano) and past and present operators of the facility. The Order requires that the named respondents take immediate action to prevent and contain any release or threatened release of hazardous substances and materials from the site and plan for and conduct an approved removal action.

Both Messrs. Sanchez and Distefano submitted written Notices of Intent to Comply in response to the 106 Order. On June 6, 1998, Mr. Distefano and his legal council attended a conference on the matter at the EPA office in San Francisco to negotiate PRP response specifics. Specific PRP responses in relation to the terms of the 106 Order, as well as, full documentation of PRP removal actions will be addressed in a future report to be submitted under START TDD# 099806-010.

### **Spill Response**

On June 12, 1998 OSC Lewis received notification from the HHMD that a vat in the back lot area of Pomona Plating was found leaking by a LACSD inspector during a routine line inspection. The START responded to check on the report and was met on-site by Mr. Biren, LACSD inspector G. Neunsinger and Mr. Distefano's legal representative K. Caffee.

The leak originated from START designated poly tank #19 (Table 4) containing approximately 1,500 gallons of an unknown greenish liquid. An approximate 5 x 7 foot puddle of the liquid had pooled from what appeared to be a small seal leak at the side of the tank. Mr. Neunsinger stated that the puddle had grown slightly in size since his morning inspection.

Mr. Biren was attempting to negotiate a PRP funded stabilization from Ms. Caffee when Mr. Sanchez and one of his workers arrived on-site. Mr. Sanchez identified the tank contents as "good nickel solution" and offered to pump the entire contents of the tank into nickel solution vats inside the building. Mr. Sanchez identified the appropriate vats as START designated vat #'s 4, 16, and 31 (Table 1). Combined, the designated vats had sufficient capacity to hold the poly tank contents.

This strategy was agreed to and Mr. Biren remained on-site to monitor the pumping operation and spill cleanup activities of Mr. Sanchez. Mr. Biren later reported to the START that the cleanup was conducted in a satisfactory manner.

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All future START activities related to Pomona Plating and the PRP monitoring efforts will be documented under TDD# 099806-010. Site assessment photodocumentation is presented in Attachment E.

If you have any further questions regarding this site assessment or report, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Benson", is written over a circular stamp or seal.

Craig Benson  
Long Beach START Manager

attachments

cc: B. Lewis  
file

# **ATTACHMENT A**

## **Figures**

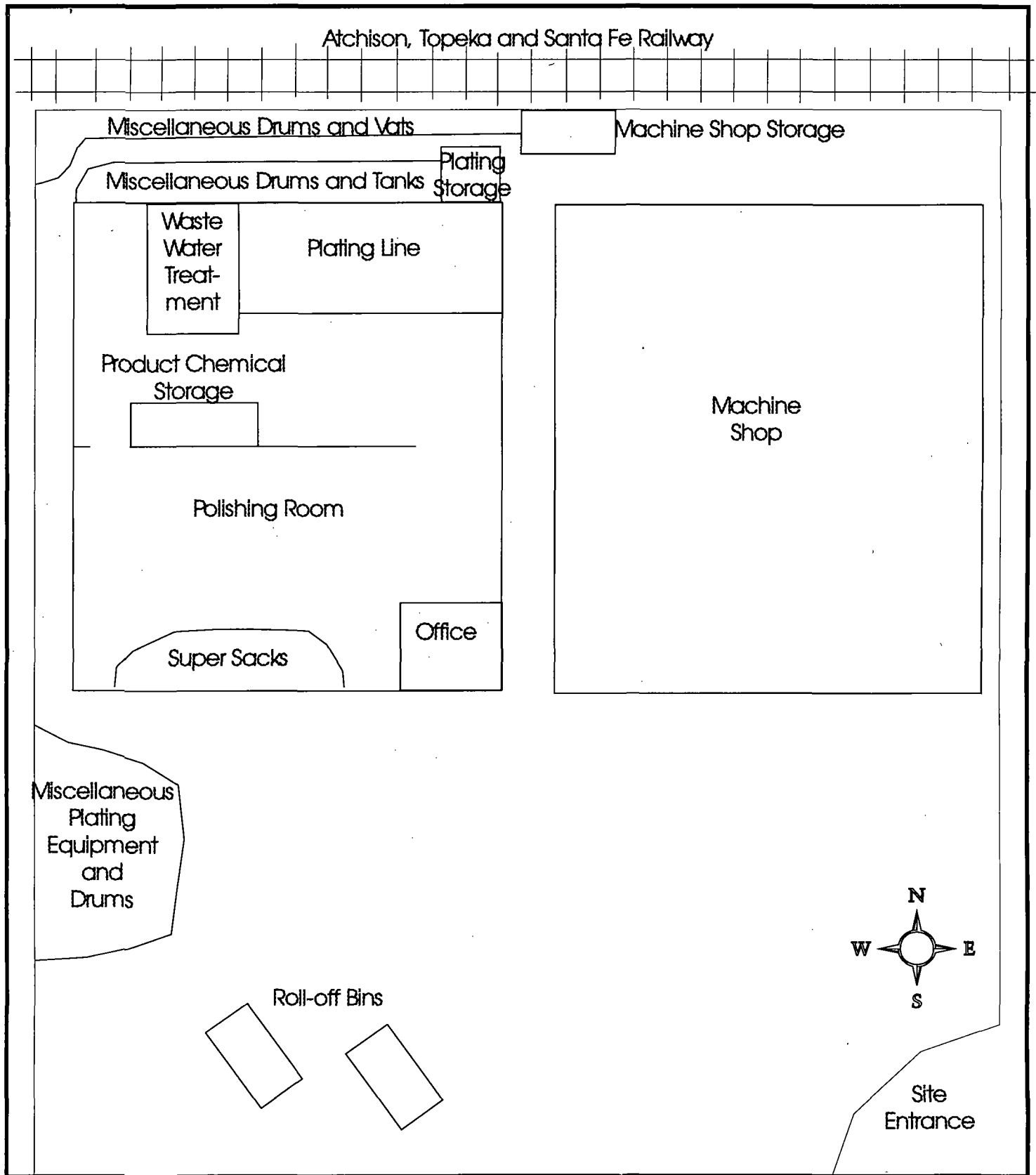
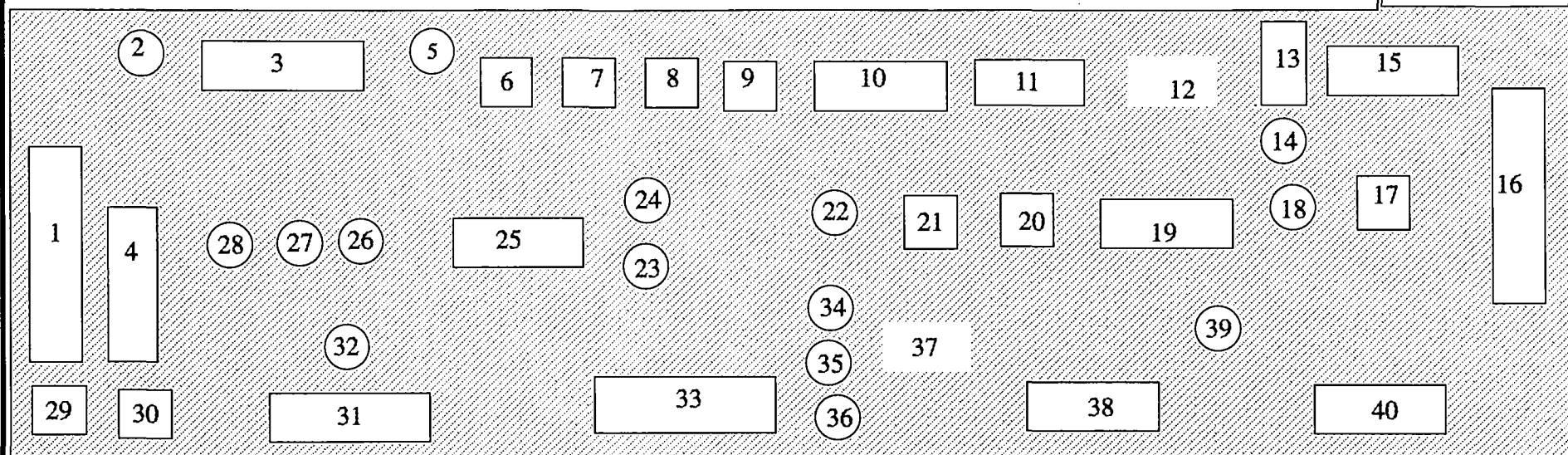


Figure 1:  
Site Diagram  
Pomona Plating  
Pomona, California

# Pomona Plating Line



- |                       |   |                         |                     |
|-----------------------|---|-------------------------|---------------------|
| 1 Acid Copper         | 11 Soap   | 21 Soap Rinse           | 31 Watts Nickel     |
| 2 Acid Copper Dragout | 12 Electro Cleaner                              | 22 Soap Dragout         | 32 Zincate Dragout  |
| 3 Watts Nickel Dummy  | 13 Nickel Chloride/<br>Hydrochloric Acid Strike | 23 Zincate Dragout      | 33 Acid Copper      |
| 4 Watts Nickel        | 14 Dragout                                      | 24 Zincate Dragout      | 34 Chrome Dragout   |
| 5 5% Sulfuric Acid    | 15 Acid Copper                                  | 25 Zincate              | 35 Chrome Dragout   |
| 6 Soap Rinse          | 16 Bright Nickel                                | 26 Dragout              | 36 Chrome Dragout   |
| 7 Nitric Acid         | 17 Rinse  | 27 Dragout              | 37 Chrome Dragout   |
| 8 Actuator            | 18 Rinse  | 28 Dragout              | 38 Chrome           |
| 9 Actuator Rinse      | 19 Rinse  | 29 Copper Dragout Rinse | 39 Chrome Dragout   |
| 10 Soap               | 20 5% Sulfuric Acid                             | 30 Copper Dragout Rinse | 40 Chrome Dragout   |
|                       |   |                         | 41 Sodium Hydroxide |

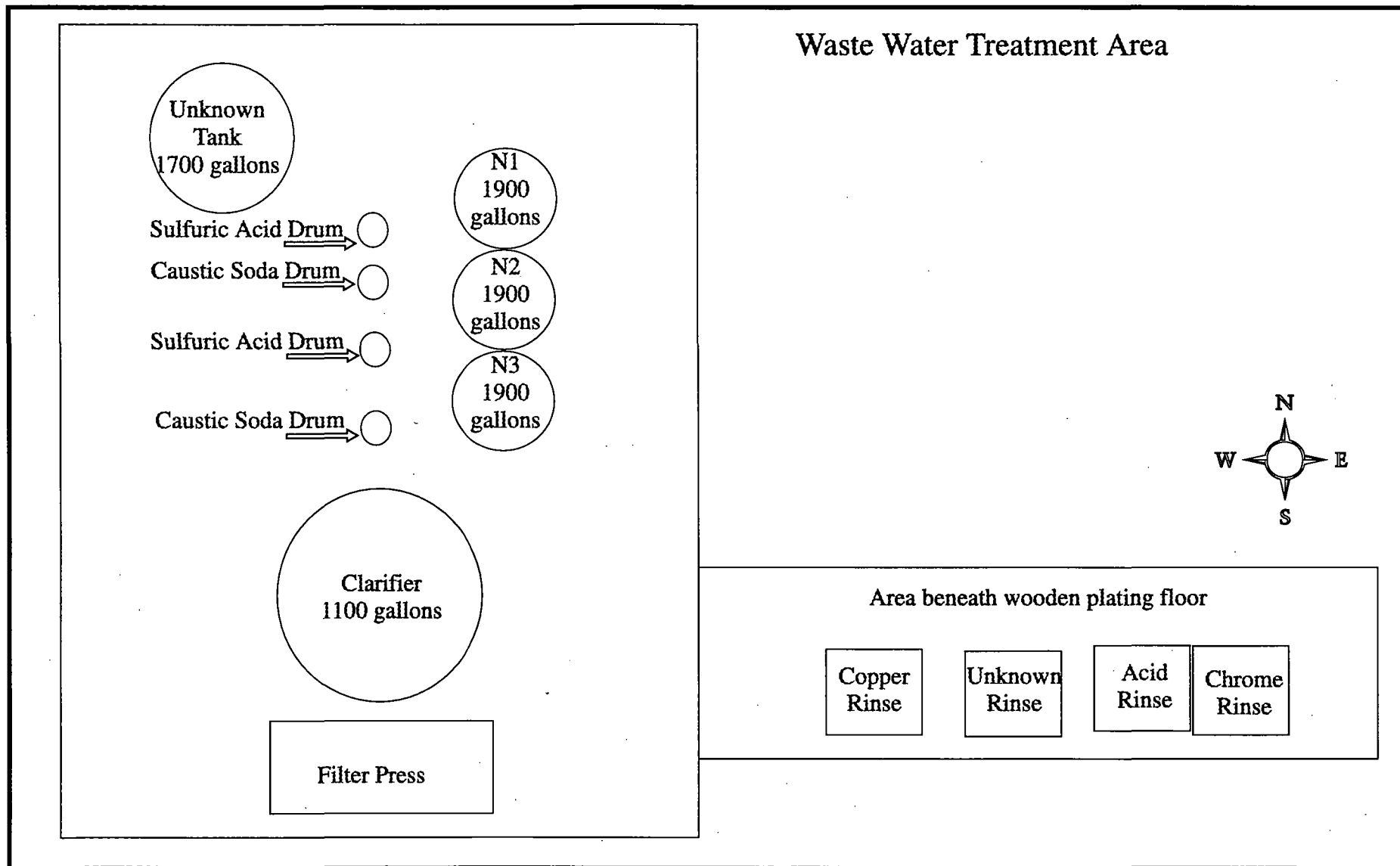


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Not to Scale

Figure 2:  
Plating Line Diagram  
Pomona Plating  
Pomona, California





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**Figure 3:**  
**Waste Water Treatment Diagram**  
**Pomona Plating**  
**Pomona, California**

## **ATTACHMENT B**

### **Area Inventory Tables 1-4**

**Table 1: Plating Line Inventory  
Pomona Plating**

Number	Type	Description <sup>1</sup>	Est. Size (feet)	Est. Capacity (gallons)	Est. Volume (gallons)
1	Vat	Acid Copper	15 x 4 x 5	2,250	2,250
2	Drum	Acid Copper Dragout	N/A	55	55
3	Vat	Watts Nickel Dummy	5 x 1.5 x 3.5	200	100
4	Vat	Watts Nickel	11 x 4 x 5	1,650	1,650
5	Drum	5% Sulfuric Acid	N/A	55	28
6	Vat	Soap Rinse	2.5 x 2.5 x 2.5	120	60
7	Vat	Nitric Acid	2.5 x 2.5 x 2.5	120	90
8	Vat	Actuator	2.5 x 2.5 x 2.5	120	60
9	Vat	Actuator Rinse	2.5 x 2.5 x 3.5	130	65
10	Vat	Soap	6 x 2.5 x 3	335	335
11	Vat	Soap	6 x 2.5 x 3	335	335
12	Vat	Electro Cleaner	2 x 3 x 3	160	160
13	Vat	Nickel Chloride/ Hydrochloric Acid	2 x 3 x 3	160	160
14	Drum	Dragout	N/A	55	55
15	Vat	Acid Copper	12 x 4.5 x 4	1,600	1,200
16	Vat	Bright Nickel	10 x 4.5 x 5	1,700	1,700
17	Vat	Rinse	2.5 x 2.5 x 2.5	120	60
18	Drum	Rinse	N/A	55	20
19	Vat	Rinse	4.5 x 2.5 x 2.5	210	105
20	Vat	5% Sulfuric Acid	2.5 x 2.5 x 2.5	120	60
21	Vat	Soap Rinse	2.5 x 2.5 x 2.5	120	12
22	Drum	Soap Dragout	N/A	55	55
23	Drum	Zincate Dragout	N/A	55	28

Table 1: Plating Line Inventory Pomona Plating					
Number	Type	Description <sup>1</sup>	Est. Size (feet)	Est. Capacity (gallons)	Est. Volume (gallons)
24	Drum	Zincate Dragout	N/A	55	28
25	Vat	Zincate	5 x 1.5 x 3	170	85
26	Drum	Dragout	N/A	55	28
27	Drum	Dragout	N/A	55	28
28	Drum	Dragout	N/A	55	28
29	Vat	Copper Dragout Rinse	2.5 x 3 x 3	170	85
30	Vat	Copper Dragout Rinse	2.5 x 3 x 3	170	85
31	Vat	Watts Nickel	9.5 x 3 x 4	850	850
32	Drum	Zincate Dragout	N/A	55	28
33	Vat	Acid Copper	12 x 5 x 4	1,800	1,800
34	Drum	Chrome Dragout	N/A	55	10
35	Drum	Chrome Dragout	N/A	55	15
36	Drum	Chrome Dragout	N/A	55	15
37	Vat	Chrome Dragout	2.5 x 2 x 1.5	55	28
38	Vat	Chrome	4 x 3 x 4	360	270
39	Drum	Chrome Dragout	N/A	55	28
40	Vat	Chrome Dragout	4.5 x 2.5 x 2.5	210	160
41	Vat	Sodium Hydroxide	2 x 2 x 4	120	90
Total Estimated Volume =					12,304 (gal.)

<sup>1</sup> as described to START by Mr. Jay White, plating consultant to Pomona Plating

Table 2: Wastewater Treatment Inventory Pomona Plating				
Type	Description	Est. Size (feet)	Est. Capacity (gallons)	Est. Volume (gallons)
Tank N1	Chrome Destruct	4 x 9	1,900	1,500
Tank N2	Acid Destruct	4 x 9	1,900	250
Tank N3	Flocculant	4 x 9	1,900	650
Filter Press	Filter Cake	N/A	N/A	N/A
Drum	Sulfuric Acid	N/A	55	55
Drum	Caustic Soda	N/A	55	55
Drum	Sulfuric Acid	N/A	55	55
Drum	Caustic Soda	N/A	55	55
Tank	Clarifier	8 x 3	1,100	400
Tank	Unknown Liquid	6 x 8	1,700	1,300
Vat	Chrome Rinse	2.5 x 2.5 x 2.5	120	60
Vat	Acid Rinse	2.5 x 2.5 x 2.5	120	60
Vat	Unknown Rinse	2.5 x 2.5 x 2.5	120	60
Vat	Copper Rinse	2.5 x 2.5 x 2.5	120	60
Total Estimated Volume =				4,560 (gal.)

Table 3: Misc. Chemicals Inside Building Pomona Plating				
Type	Description	Location	Est. Capacity (gallons)	Est. Volume (gallons)
Drums (7)	Unknowns	Plating Room	385	350
Drums (2)	Sulfuric Acid	Plating Room	110	100.
Drum	Nickel Sulfate Liquid	Plating Room	55	50
Drum	Liquid Zincate	Plating Room	55	50
Drum	Nickel Sulfate	Plating Room	55	50
Drum	Soak 115	Plating Room	45	40
Drum	Soak 101LF	Plating Room	55	50
Drum	Chem Cote 3252	Plating Room	55	50
Drum	"Good Zincate"	Plating Room	55	50
Containers (24)	Misc. Additives	Plating Room	120	100
Poly Tank	Outside Berm Liquids	Plating Room	3,000	400
Poly Tank	Acid Rinse	Plating Room	2,250	2,250
Drum	Spent Nickel Liquid	Polishing Room	55	50
Total Estimated Liquids Volume = 3,590 (gal.)				
Fiber Bags (4)	Ferrous Sulfate	Plating Room	200 lbs.	200 lbs.
Fiber Bags (5)	Sodium Metabisulfite	Plating Room	250 lbs.	220 lbs.
Supersacks (18)	Filter Cake	Polishing Room	36,000 lbs.	36,000 lbs
Total Estimated Solids Volume = 36,440 (lbs.)				

**Table 4: Outside Areas Inventory<sup>1</sup>**  
**Pomona Plating**

<b>Number</b>	<b>Type</b>	<b>Description</b>	<b>Est. Size (feet)</b>	<b>Est. Capacity (gallons)</b>	<b>Est. Volume (gallons)</b>
1	Vat	Unknown	2.5 x 1 x 3	55	8
2	Vat	Unknown	4.5 x 2.5 x 2.5	210	160
3	Vat	Unknown	6.5 x 2 x 4	390	310
4	Vat	Sludge?	8.5 x 2 x 4	510	380
5	Vat	Solvent?	6 x 2 x 4	375	40
6	Vat	Water?	2.5 x 2.5 x 2.5	110	110
7	Vat	Unknown	6 x 3 x 4	540	430
8	Vat	Copper Sludge?	12 x 4.5 x 5	2,000	1,000
9	Vat	Unknown	10 x 4 x 4	1,200	1,200
10	Vat	Copper Sludge?	6 x 3.5 x 3.5	560	280
11	Vat	Empty	3 x 3 x 3	200	0
12	Vat	"Spent Chrome"	10 x 5 x 5	1,900	1,900
13	Poly Tank	Rain Water?	8 x 7	2,300	1,300
14	Poly Tank	Rain Water?	9 x 6	1,400	1,400
15	Poly Tank	"Water Rinse"	9 x 6	1,400	1,400
16	Poly Tank	Unknown	7 x 6	1,500	1,125
17	Poly Tank	Unknown	7 x 6	1,600	1,600
18	Vat	Unknown	5 x 4 x 4	600	480
19	Poly Tank	Unknown	5 x 4	1,900	1,500
20	Vat	"Good Nickel Liq."	6 x 3 x 4	550	500
21	Vat	Copper Liquid?	8 x 7 x 5	2,000	2,000
22	Vat	Can't Access	5 x 4 x 4	600	Unknown
23	Poly Tank	Unknown	7 x 6	1,600	1,600
Total Estimated Tank and Vat Liquid Volume =					18, 723 (gal.)

Table 4: Outside Areas Inventory <sup>1</sup> Pomona Plating					
Number	Type	Description	Est. Size (feet)	Est. Capacity (gallons)	Est. Volume (gallons)
N/A	Drums (35)	"Spent Nitric and/or Acid" (D007)	N/A	1,925	1,900
N/A	Drums (4)	"Chromic Waste"	N/A	220	220
N/A	Drum	Bleach	N/A	55	55
N/A	Drums (5)	Sodium Hydroxide	N/A	275	275
N/A	Drums (3)	Nitric Acid	N/A	165	165
N/A	Containers (5-15)	Unknown	N/A	N/A	70
N/A	Drums (9)	Misc. Cleaning and Floc. Solutions	N/A	495	495
N/A	Roll-Off- Bins (2)	Cont. Debris	N/A	40 yd <sup>3</sup>	40 yd <sup>3</sup>
Total Estimated Drum and Container Liquid Volume = Total Estimated Solids Volume =					3,345 (gal.) 40 yd <sup>3</sup>

<sup>1</sup> All inventory items in facility back lot, with exception of last two table entries located in front parking lot area



**ATTACHMENT C**  
**Quality Assurance Sampling Plan**

**Superfund Technical Assessment and Response Team**

**Quality Assurance Sampling Plan**

**Pomona Plating Site**

**Pomona, California**

**PAN: 0300PPSF-XX**

**TDD: 099804-001**

**U.S. Environmental Protection Agency**

**Region IX**

**Contract Number: 68-W6-0010**

**Prepared by:**

**Ecology and Environment, Inc.**

**May 12, 1998**

**Approvals:**

Steven Walder  
Steven Walder, Project Manager

5/12/98  
Date

William Lewis  
William Lewis, EPA OSC

5/12/98  
Date



**ecology and environment, inc.**

International Specialists in the Environment

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Tel: (562) 435-6188, Fax: (562) 435-6687

recycled paper

## **1.0 INTRODUCTION**

Environmental Protection Agency (EPA), Emergency Response Office (ERO) On-Scene Coordinator (OSC) B. Lewis has tasked the Ecology & Environment, Superfund Technical Assessment and Response Team (START) to conduct a sampling and analysis investigation at the Pomona Plating facility in Pomona, Los Angeles County, California. This Quality Assurance Sampling Plan (QASP) describes the procedures that were used to fulfill the assignment.

This sampling plan was developed under EPA quality assurance/quality control guidelines for removal activities in conjunction with the Region IX START Quality Assurance Project Plan (QAPjP) to address the sampling methods and quality assurance issues relevant to this sampling activity.

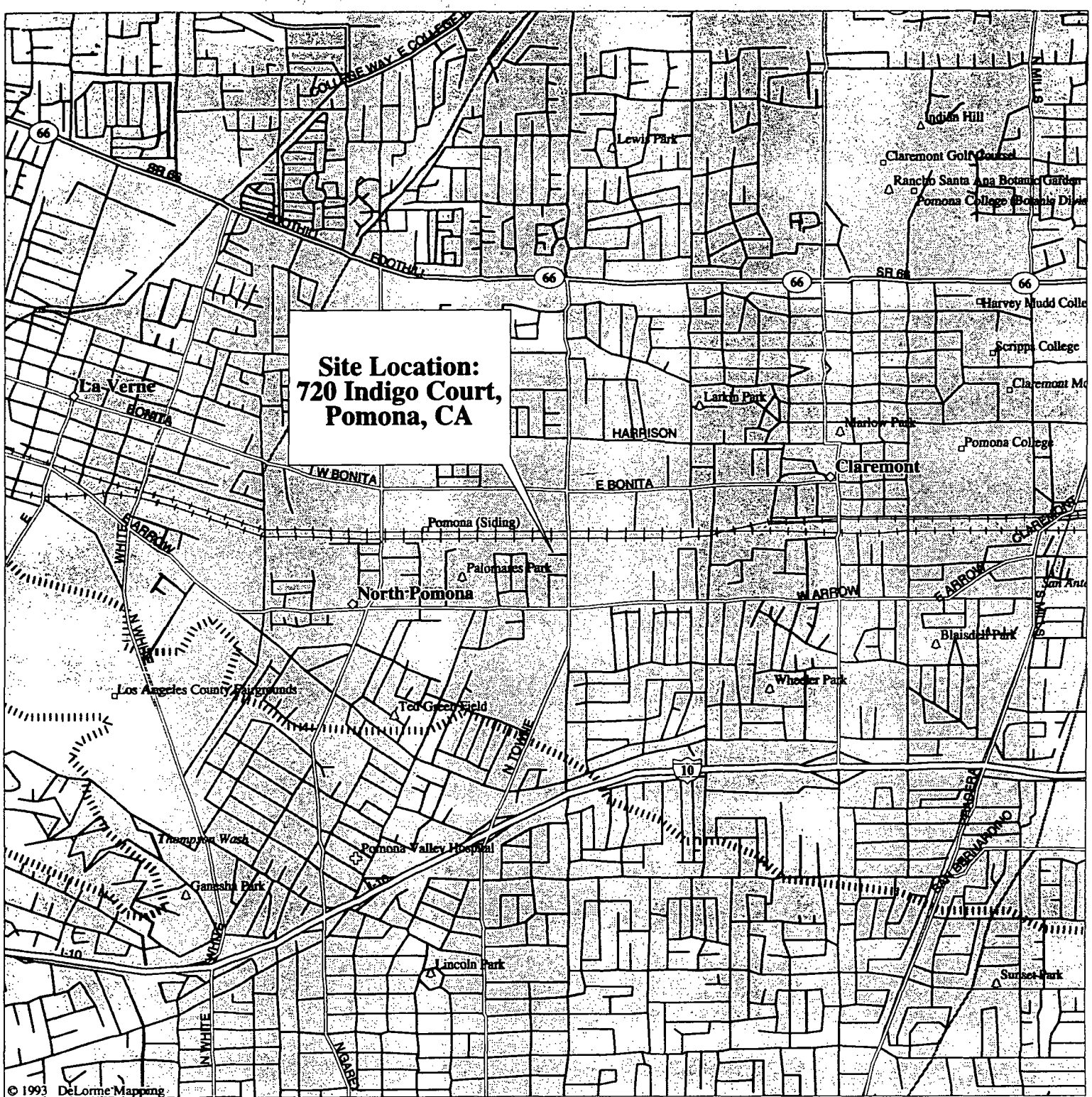
## **2.0 BACKGROUND**

On April 1, 1998, the EPA tasked the START to evaluate site conditions at the Pomona Plating facility located at 720 Indigo Court, Pomona, California (see Figure 1: Site Location Map). Pomona Plating is an inactive plating facility which contains an undetermined volume of plating wastes. Los Angeles County Fire Department, Health Hazardous Materials Division (HHMD) has conducted inspections at the site since 1987. HHMD records indicate that the plating facility has been in violation of hazardous waste management practices on several occasions. Inadequate response to HHMD issued violation notices prompted a request for EPA assistance.

The facility is located in a mixed industrial and residential area and enclosed by either wire or concrete block fencing. Access to the facility is through a drive-way gate which appears to remain open during business hours. Adjacent to the facility (east of the building) and within the enclosed fenced area is a metal machining business. Approximately 10 people can be seen working in this facility during business hours. The distance between the plating shop and the machine shop is approximately 15 feet.

Pomona Plating consists of a single approximate 10,000 square foot structure. The building is equally divided between a polishing room /office area and main plating line/wastewater treatment and chemical storage area. A large parking lot is located south of the facility which also serves the metal machine shop. Facility access is accomplished through a door located on the south facing wall of the warehouse, doorways on the east facing wall of the warehouse, and several roll-up bay doors on the north, south, and east sides of the building. Access into the facility can also be made through an unsecured hole on the north facing wall of the warehouse. The property also contains an approximate 2500 square foot back lot area where plating chemicals and waste are stored. Immediately north of this back lot area fence line is a rail-line and right of way. (see Figure 2, Site Layout).

Within the parking lot is miscellaneous plating debris, various plastic and metal fifty-five gallon drums, partially burned plastic plating vats, and 2 covered roll-off bins filled with what is believed to be plating cake material. Also within the parking lot are the cars which belong to the employees



# LEGEND

- |                      |                    |
|----------------------|--------------------|
| Population Center    | Hwy Ramps          |
| State Route          | Major Street/Road  |
| Geo Feature          | State Route        |
| Town, Small City     | Interstate Highway |
| Hospital             | Railroad           |
| Park                 | River              |
| Interstate, Turnpike | Contour            |
| County Boundary      |                    |
| Street, Road         |                    |

Scale 1:31,250 (at center)

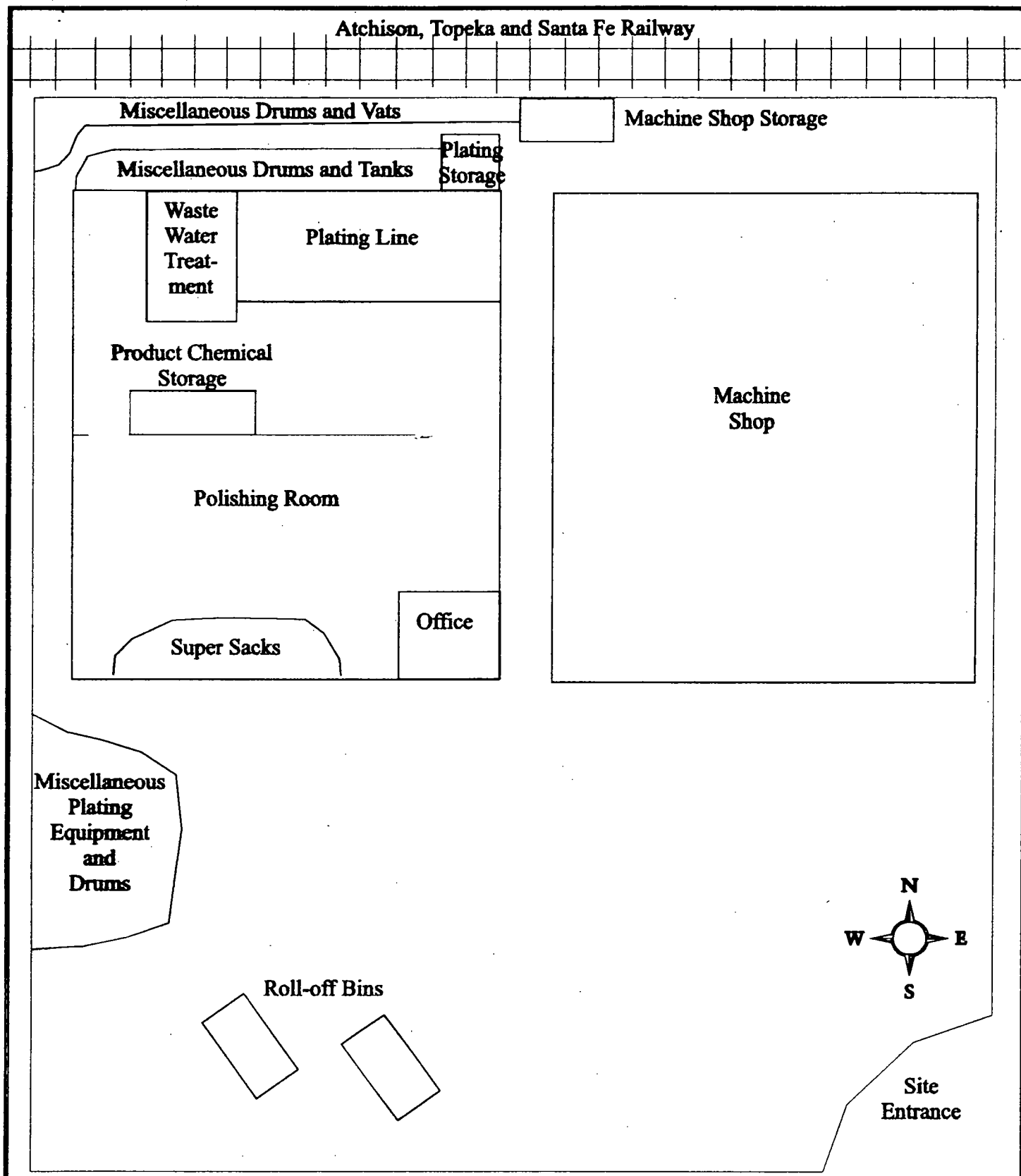
2000 Feet

1000 Meters

Figure 1: Site Location

Mag 14.00

Tue May 12 12:40:53 1998



Not To Scale

Figure 2:  
Site Diagram  
Pomona Plating  
Pomona, California

that work at the muffler facility. On the north side of the plating warehouse are numerous fifty-five gallon drums, vats and plastic portable open-top tanks.

On May 5, 1998, the START and EPA Task Monitor conducted an initial site assessment of the facility. The team was initially escorted by the business owner and his consultants. The majority of chemical waste streams on-site were associated with copper, nickel and chrome plating operations which ceased at the facility in December 1997. Preliminary inventory's were prepared for each of the chemical and waste storage areas identified as follows:

- Plating line - over 40 vats and containers with chrome, copper, and nickel plating solutions; rinse waters; and cleaning solutions. The majority of vessels were near capacity.
- Wastewater treatment system -
- Other miscellaneous waste streams inside facility - 18 Supersacks (1 ton capacity) from treatment line filter cake, approximately 30 drums and containers containing product plating additives, miscellaneous spent plating solutions, and other miscellaneous untreated plating solutions and rinse waters.
- Back lot - Over 6,000 gallons of spent nitric/chromic acid in 55 gallons drums and portable tanks, miscellaneous unidentified plating sludges and rinse waters.
- South parking lot - 2 roll-off-bins of contaminated fire debris, floor sweepings and miscellaneous debris, process equipment, empty vats, 9 drums of wastewater treatment system additives and cleaning solutions, miscellaneous metal parts, discarded plating equipment and miscellaneous empty containers.

The chemical waste identification was provided to the EPA and START team members by the business owner and/or his plating consultants. In many instances, RCRA hazardous waste Marks were present on many of the 55 gallons drums and storage tanks representing the contents to be spent acid plating solutions and rinse waters. The detailed inventories and a more complete description are contained in the separate final site assessment report under this TDD.

### **3.0 DATA USE OBJECTIVES**

This sampling and analysis investigation was conducted to document the existence of characteristic hazardous waste as identified by Title 22, *California Code of Regulations*, Chapter 11, and Title 40, *Code of Federal Regulations*, Part 261. The six samples collected and described herein represent the first data collection efforts made by USEPA. The data will be referenced in federal removal action documents or potentially responsible party cleanup directives.

### **4.0 QUALITY ASSURANCE OBJECTIVES**

All laboratory data generated for this effort will be designed to meet the **definitive** data category as defined in *Data Quality Objectives Process for Superfund, Interim Final Guidance*, September 1993, 9355.9-01. To accomplish this, all analytical methods employed for this project were methods approved by EPA. Specific requirements for the definitive data category are described in Section 7.0.

## 5.0 APPROACH AND SAMPLING METHODOLOGIES

### 5.1 Sampling Design

On May 5, 1998, START collected six samples from the Pomona Plating property to be submitted for off-site laboratory analysis. The samples collected are described below:

**Table 1:**

Sample Number	Description	Location
PP-1	Grab sample collected from randomly selected unopened "Supersack" of filter cake.	Polishing Room
PP-2	Composite of floor sludge accumulation collected within bermed area of Wastewater Treatment Area.	Wastewater Treatment Area (Plating Room)
PP-3	Composite of floor sludge are accumulation within bermed area on west end of plating line.	Plating Room
PP-4	Composite liquid sample of two drums Marked as "Nitric Spent" (Waste Code D007)	Back Lot vat and drum storage area
PP-5	Grab sample collected from a vat marked as vat #12 (numbered by START) Marked as "Spent Chrome" (Waste Code D007)	Back Lot vat and drum storage area
PP-6	Composite of soils at southern fence line from a small strip of soil located between front parking lot and adjacent business. Sample location was down-gradient of plating facility.	Front Lot

The six sampling locations described above were agreed to by the START and the EPA Task Monitor. The samples collected were chosen based upon field observations and knowledge gained through consultation with the business owner and his consultants. These sampling locations were chosen in an attempt to document the presence of hazardous waste determining levels of metals and corrosivity.

### 5.2 Sampling Collection and Equipment

Each of the solids samples collected (PP-1, PP-2, PP-3 and PP-6) were collected utilizing new dedicated, sterile, plastic sampling trowels. Liquid samples PP-4 and PP-5 were collected utilizing new dedicated glass thieving rods. The use of dedicated sampling equipment precluded the need for sampling equipment decontamination. All samples were extruded into specially cleaned, Lot numbered, 9 ounce glass containers with Teflon lined lids.

### 5.3 Field Quality Assurance Samples

No field quality assurance/quality control (QA/QC) samples were collected during the May 5, 1998 sampling effort due to the lack of knowledge regarding sample population homogeneity and the limitations of this sampling effort.

### 5.4 Sampling Handling and Shipment

Each of the collected samples was labeled and placed in a secured cushioned container for transport to the START Long Beach office for secured overnight refrigerated storage. The samples were retrieved by the subcontracted laboratory courier the following day.

### 5.5 Sample Documentation

The following represents the requisite sample documentation:

#### Field Logbook

The sampling team maintained a field logbook detailing site activities and observations. Entries may include the following items, as appropriate:

1. Site name and project number
2. Name(s) of personnel on-site
3. Dates and times of entries
4. Descriptions of relevant site activities.
5. Weather conditions
6. Identification and description of samples and locations
7. Subcontractor information and names of on-site personnel
8. Site sketches (separate)

#### Sample Labels

Sample labels were securely affixed to each sample container and clearly identified each sample with the following information:

1. Site name
2. Date of sample collection
3. Any sample preservation
4. Initials of sampler(s)
5. Sample number.

#### Chain-of-Custody Form

A Chain-of-Custody record was prepared and maintained from the time the samples were collected until their final disposition. Every transfer of custody was documented on the Chain-of-Custody form.



The Chain-of-Custody form included the following:

1. Sample identification number
2. Sample date
3. Sample location
4. Analysis requested
5. Name(s) and signature(s) of sampler(s)
6. Signature(s) of any individual(s) with control over samples.

#### Custody Seals

Custody seals demonstrate that a sample container has not been tampered with or opened. Custody seals were attached to the lids of each individual sample container. The START signed the Custody Seals and affixed them to the individual sample containers so that the sample containers could not be opened without breaking the seal.

### **6.0 ANALYTICAL METHODS AND PROCEDURES**

All samples were collected, preserved, and transported using standard field practices for the assurance of obtaining quality data, as described in Section 5.0. Table 2 lists the EPA-approved analytical methods which were utilized for this project, as well as the required sample containers and preservatives. Method detection limits required of the analytical laboratories will be those specified in the individual methods, at a minimum.

To provide analytical quality control for the analytical program of this QASP, the following measures were utilized:

- All sample analyses were to be conducted by laboratories certified by the State of California for the analytical methods to be conducted.
- A CLP-type data package will be required from the laboratory for all resultant data.

**Table 2:**

Analytical Method	Container	Preservation	Maximum Holding Time for Extraction (days)	Maximum
CAM 17 Metals, TTLC EPA 6010&7000 Series	(1) 8 oz. Glass jar with Teflon-lined cap	None	NA	6 months*
pH EPA 9040	(1) 8 oz. Glass jar with Teflon-lined cap	None	NA	analyze upon receipt

\* Except for Mercury ( 28 days)

## **7.0 QUALITY ASSURANCE REQUIREMENTS**

The following requirements apply to the definitive data quality level chosen as the sole category of data quality for this project:

1. Provide sample documentation in the form of field logbooks, appropriate field data sheets and chain-of-custody forms.
2. Initial and continuing calibrations will be documented.
3. The detection limit will be determined by the laboratory according to the method requirements, and recorded, along with the data, where appropriate.
4. Analytes will be identified and quantified.
5. QC blanks will be analyzed.
6. Matrix spike recoveries will be documented.
7. Analytical error determination in the form of replicate samples must be performed on 10 percent of the samples.
8. Total measurements error documenting the precision of the measurement system from sample acquisition through analysis will be determined.

## **8.0 SCHEDULE OF ACTIVITIES**

The work schedule for the six samples collected is presented in Table 3 below.

**Table 3:**

Activity	Date
Field Work	5/5/98
QASP Preparation	5/5 -5/12/98
Laboratory Analysis	5/6/98 - 5/14/98
Data Validation	6/2/98 to completion
Report and Other Deliverables Submittal	as requested by OSC

## 9.0 PROJECT ORGANIZATION AND RESPONSIBILITIES

The EPA OSC, B. Lewis, provided overall direction to the START staff concerning project sampling needs, objectives and schedule. START members C. Benson, S. Walder and E. Hamrick were the primary points of contact with the OSC for this initial sampling phase of this project. These same START member jointly developed and completed this QASP document. Future points of contact regarding future site work, if any will be at a minimum, S. Walder, and E. Hamrick. Staffing for future site work, if any, will be decided upon at a future date. Table 4 below outlines personnel assignments for the May 5, 1998 sampling event:

**Table 4:**

Personnel	Responsibility
B. Lewis	EPA OSC - Overall Project Director
S. Walder	START Project Manager/Field Sampling
C. Benson	Site Safety Officer/Field Sampling Support
E. Hamrick	START Project Supervisor/Field Sampling

## 10.0 DELIVERABLES

The START will keep the OSC informed of the technical and financial progress of this project. Activities under this project will be documented in trip, analytical and/or final reports. Activities will also be summarized in the appropriate formats for inclusion into the monthly and annual START reports.

The following deliverables will be provided under this project:

### QASP

The preparation of this document fulfills the requirements for a QASP.

### Data Validation Report

Data generated under this plan will be evaluated in accord with appropriate criteria contained in the Removal Program Data Validation Procedures which accompany OSWER Directive 9360.4-1. This assessment of data acceptability or usability will be provided as part of the final report for this investigation.

### Miscellaneous Deliverables

Other miscellaneous deliverables such as site figures, tables, etc. will be provided to the OSC as requested.

### Final Report

A final report will be prepared to correlate available background information with data generated under this sampling event and to identify supportable conclusions and recommendations which satisfy the objectives of the QASP. A draft report will be submitted before the final report if so requested by the OSC.

## **ATTACHMENT D**

### **Laboratory Data Summary**



LABORATORIES, INC.

630 Maple Ave.

Torrance, CA 90503

Telephone: (310) 618-8889

Fax: (310) 618-0818

Date: 05-20-1998  
EMAX Batch No.: 98E027

Attn: Craig Benson

Ecology & Environment  
11 Golden Shore # 340  
Long Beach CA 90802

Subject: Laboratory Report  
Project: Pomona Plating

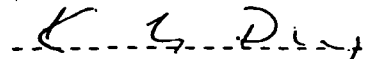
-----  
Enclosed is the Laboratory report for samples received on  
05/06/98. The data reported include :

Sample ID	Control #	Col Date	Matrix	Analysis
PP-1	E027-01	05/05/98	Soil	Metals Mercury pH
PP-2	E027-02	05/05/98	Soil	Metals Mercury pH
PP-3	E027-03	05/05/98	Soil	Metals Mercury pH
PP-4	E027-04	05/05/98	Soil	Metals Mercury pH
PP-5	E027-05	05/05/98	Soil	Metals Mercury pH
PP-6	E027-06	05/05/98	Soil	Metals Mercury pH

The results are summarized on the following pages.

Please feel free to call if you have any questions concerning  
these results.

Sincerely yours,

  
Kam Y. Pang, Ph.D.  
Laboratory Director

LABORATORY REPORT FOR  
ECOLOGY AND ENVIRONMENT  
POMONA PLATING

METHOD 9045C  
pH

SDG #: 98E027

8080

CLIENT: Ecology & Environment  
PROJECT: Pomona Plating  
BATCH NO.: 98E027  
MATRIX: SOIL  
CAL REF: NA

DATE COLLECTED: 05/05/98  
DATE RECEIVED: 05/06/98  
DATE EXTRACTED: NA  
INSTRUMENT ID: 1129  
PREP BATCH: PHE001S

SAMPLE ID	CONTROL NO	RESULT (pH unit)	DILUTION FACTOR	RL (pH unit)	MDL (pH unit)	ANALYZED DATETIME
PP-1	E027-01	7.4	1	.1	.1	05/13/98 15:15
PP-2	E027-02	10.6	1	.1	.1	05/13/98 15:20
PP-3	E027-03	4.4	1	.1	.1	05/13/98 15:25
PP-3	E027-03D	4.4	1	.1	.1	05/13/98 15:30
PP-4	E027-04	<1.0	1	.1	.1	05/13/98 15:35
PP-5	E027-05	0.65	1	.1	.1	05/13/98 15:40
PP-6	E027-06	6.0	1	.1	.1	05/13/98 15:45

RL: Reporting Limit

6/10/98 (sw)



LABORATORY REPORT FOR

ECOLOGY & ENVIRONMENT

POMONA PLATING

METALS

SDG #: 98E027

7006

METHOD 3050B/6010B  
CAM METALS BY ICP

```

=====
Client       : ECOLOGY & ENVIRONMENT          Date Collected: 05/05/98
Project      : POMONA PLATING                 Date Received: 05/06/98
SDG NO.     : 98E027-                         Date Extracted: 05/08/98 13:00
Sample ID    : PP-1                           Date Analyzed: 05/11/98 21:21
Lab Samp ID  : E027-01                        Dilution Factor: 2
Lab File ID  : I07E011023                     Matrix : SOIL
Ext Btch ID  : IPE011S                        % Moisture : NA
Calib. Ref.: I07E011021                      Instrument ID : EMAXTI07
=====
  
```

PARAMETERS	RESULTS (mg/kg)	RL (mg/kg)	MDL (mg/kg)
Antimony	ND	20	11
Arsenic	ND	20	8.52
Barium	81.3	1	.148
Beryllium	ND	1	.062
Cadmium	ND	1	.972
Chromium	6640	2	.57J
Cobalt	ND	4	1.54
Copper	7790	2	.944J
Lead	77	20	8.03
Molybdenum	ND	10	1.65
Nickel	9830	4	3.37J
Selenium	ND	40	14.5
Silver	ND	4	1.05
Thallium	ND	100	15.9
Vanadium	ND	2	.788
Zinc	1690	4	2.43J

6/10/98 (20)

METHOD 3050B/6010B  
CAM METALS BY ICP

```

=====
Client      : ECOLOGY & ENVIRONMENT          Date Collected: 05/05/98
Project     : POMONA PLATING                 Date Received: 05/06/98
SDG NO.    : 98E027                         Date Extracted: 05/08/98 13:00
Sample ID   : PP-2                          Date Analyzed: 05/11/98 21:25
Lab Samp ID : E027-02                       Dilution Factor: 2
Lab File ID : I07E011024                    Matrix : SOIL
Ext Btch ID : IPE011S                       % Moisture : NA
Calib. Ref.: I07E011021                     Instrument ID : EMAXTI07
=====
  
```

PARAMETERS	RESULTS (mg/kg)	RL (mg/kg)	MDL (mg/kg)
Antimony	ND	20	11
Arsenic	ND	20	8.52
Barium	ND	1	.148
Beryllium	ND	1	.052
Cadmium	ND	1	.972
Chromium	2390	2	.67J
Cobalt	ND	4	1.54
Copper	1190	2	.944J
Lead	ND	20	8.03
Molybdenum	ND	10	1.65
Nickel	838	4	3.37J
Selenium	ND	40	14.5
Silver	ND	4	1.05
Thallium	ND	100	15.9
Vanadium	ND	2	.788
Zinc	633	4	2.43J

6/10/98 *in*

METHOD 3050B/6010B  
CAM METALS BY ICP

```

=====
Client       : ECOLOGY & ENVIRONMENT      Date Collected: 05/05/98
Project      : POMONA PLATING             Date Received: 05/06/98
SDG NO.     : 98E027                     Date Extracted: 05/08/98 13:00
Sample ID    : PP-3                      Date Analyzed: 05/11/98 21:29
Lab Samp ID  : E027-03                   Dilution Factor: 5
Lab File ID  : I07E011025                Matrix : SOIL
Ext Btch ID  : IPE011S                   % Moisture : NA
Calib. Ref.: I07E011021                  Instrument ID : EMAXTI07
=====
  
```

PARAMETERS	RESULTS (mg/kg)	RL (mg/kg)	MDL (mg/kg)
Antimony	ND	50	27.6
Arsenic	ND	50	21.3
Barium	ND	2.5	.37
Beryllium	ND	2.5	.155
Cadmium	ND	2.5	2.43
Chromium	148	5	1.63
Cobalt	ND	10	3.85
Copper	1360	5	2.36J
Lead	ND	50	20.1
Molybdenum	ND	25	4.13
Nickel	124000	40	33.7J
Selenium	ND	100	36.2
Silver	ND	10	2.62
Thallium	ND	250	39.8
Vanadium	ND	5	1.97
Zinc	816	10	6.09J

^ Analyzed at DF 20 at 22:15

6/10/98  
JW

7006

METHOD 3050B/6010B  
CAM METALS BY ICP

```

=====
Client       : ECOLOGY & ENVIRONMENT          Date Collected: 05/05/98
Project      : POMONA PLATING                 Date Received: 05/06/98
SDG NO.     : 98E027                          Date Extracted: 05/08/98 13:00
Sample ID    : PP-4                          Date Analyzed: 05/11/98 21:33
Lab Samp ID  : E027-04                       Dilution Factor: 10
Lab File ID  : I07E011026                    Matrix : SOIL
Ext Btch ID  : IPE011S                       % Moisture : NA
Calib. Ref. : I07E011021                     Instrument ID : EMAXTI07
=====
  
```

PARAMETERS	RESULTS (mg/kg)	RL (mg/kg)	MDL (mg/kg)
Antimony	ND	100	55.2
Arsenic	ND	100	42.6
Barium	ND	5	.74
Beryllium	ND	5	.31
Cadmium	ND	5	4.66
Chromium	ND	10	3.35
Cobalt	ND	20	7.69
Copper	85100	10	4.72J
Lead	ND	100	40.2
Molybdenum	ND	50	8.26
Nickel	32000	20	16.9J
Selenium	ND	200	72.4
Silver	ND	20	5.25
Thallium	ND	500	79.6
Vanadium	ND	10	3.94
Zinc	ND	20	12.2

6/10/98  
JD

METHOD 3050B/6010B  
CAM METALS BY ICP

```

=====
Client      : ECOLOGY & ENVIRONMENT      Date Collected: 05/05/98
Project     : POMONA PLATING             Date Received: 05/06/98
SDG NO.-   : 98E027                     Date Extracted: 05/08/98 13:00
Sample ID:  PP-5                        Date Analyzed: 05/11/98 21:37
Lab Samp ID: E027-05                    Dilution Factor: 10
Lab File ID: I07E011027                 Matrix : SOIL
Ext Btch ID: IPE011S                    % Moisture : NA
Calib. Ref.: I07E011021                 Instrument ID : EMAXTI07
=====

```

PARAMETERS	RESULTS (mg/kg)	RL (mg/kg)	MDL (mg/kg)
Antimony	ND	100	55.2
Arsenic	ND	100	42.6
Barium	ND	5	.74
Beryllium	ND	5	.31
Cadmium	ND	5	4.86
Chromium	117000	10	3.35
Cobalt	ND	20	7.69
Copper	5330	10	4.72
Lead	ND	100	40.2
Molybdenum	ND	50	8.26
Nickel	3060	20	16.9
Selenium	ND	200	72.4
Silver	ND	20	5.25
Thallium	ND	500	79.6
Vanadium	ND	10	3.94
Zinc	568	20	12.2

6/10/98 *Gu*

METHOD 3050B/6010B  
CAM METALS BY ICP

```

=====
Client      : ECOLOGY & ENVIRONMENT      Date Collected: 05/05/98
Project     : POMONA PLATING             Date Received: 05/06/98
SDG NO.    : 98E027                     Date Extracted: 05/08/98 13:00
Sample ID: PP-6                          Date Analyzed: 05/11/98 21:40
Lab Samp ID: E027-06                     Dilution Factor: 1
Lab File ID: I07E011028                  Matrix : SOIL
Ext Btch ID: IPE011S                     % Moisture : 25.1
Calib. Ref.: I07E011021                  Instrument ID : EMAXTI07
=====

```

PARAMETERS	RESULTS (mg/kg)	RL (mg/kg)	MDL (mg/kg)
Antimony	ND	13.4	7.37
Arsenic	ND	13.4	5.69
Barium	114	.668	.0988
Beryllium	ND	.668	.0414
Cadmium	1.31	.668	.649
Chromium	221	1.34	.447
Cobalt	8.75	2.67	1.03
Copper	3560	1.34	.63
Lead	106	13.4	5.36
Molybdenum	ND	6.68	1.1
Nickel	2120	2.67	2.25
Selenium	44.1	26.7	9.67
Silver	ND	2.67	.701
Thallium	ND	66.8	10.6
Vanadium	28	1.34	.526
Zinc	435	2.67	1.62

6/10/98 *TL*

METHOD 7471A  
MERCURY BY COLD VAPOR

=====

CLIENT:	Ecology & Environment	DATE COLLECTED:	05/05/98
PROJECT:	Pomona Plating	DATE RECEIVED:	05/06/98
BATCH NO.:	98E027	DATE EXTRACTED:	05/12/98 15:00
MATRIX:	SOIL	INSTRUMENT ID:	T123
CAL REF:	M98E013-32	PREP BATCH:	HGE013S

=====

SAMPLE ID	CONTROL NO	RESULT (mg/kg)	DL MOIST FACTOR (%)	RL (mg/kg)	MDL (mg/kg)	ANALYZED DATETIME
PP-1	E027-01	ND	1 NA	.1	.017	05/13/98 13:24
PP-2	E027-02	ND	1 NA	.1	.017	05/13/98 13:28
PP-3	E027-03	ND	1 NA	.1	.017	05/13/98 13:32
PP-4	E027-04	ND	1 NA	.1	.017	05/13/98 13:36
PP-5	E027-05	1.14	1 NA	.1	.017	05/13/98 13:48
PP-6	E027-06	ND	1 25.1	.13	.023	05/13/98 13:44
PP-6	E027-060	ND	1 25.1	.13	.023	05/13/98 14:00
MBLK1S	HGE013S8	ND	1 NA	.1	.017	05/13/98 13:12

RL: Reporting Limit  
CAL REF: M98E013-44, for E027-06

*Handwritten:* 4/15/98 (3)

7010



**Office of Enforcement**

75 Hawthorne Street

**San Francisco, California 94105**

# CHAIN OF CUSTODY RECORD

**Distribution:** Original Accompanies Shipment; Copy to Coordinator, Field Files

Q 1551

# **ATTACHMENT E**

## **Photodocumentation**

Pomona Plating Site Assessment  
Pomona, California

TDD: 099804-001

PAN: 0300PPSF-XX



Miscellaneous debris located in front lot, looking northwest.

Photographer: E. Hamrick

Date: 4/29/98



Drums and vats located in back lot/north property line, looking northeast.

Photographer: E. Hamrick

Date: 4/29/98

Pomona Plating Site Assessment  
Pomona, California

TDD: 099804-001

PAN: 0300PPSF-XX



Tank containing waste acid rinse solution, located in main plating room.

Photographer: E. Hamrick

Date: 4/29/98



Looking inside wastewater treatment area berm.

Photographer: E. Hamrick

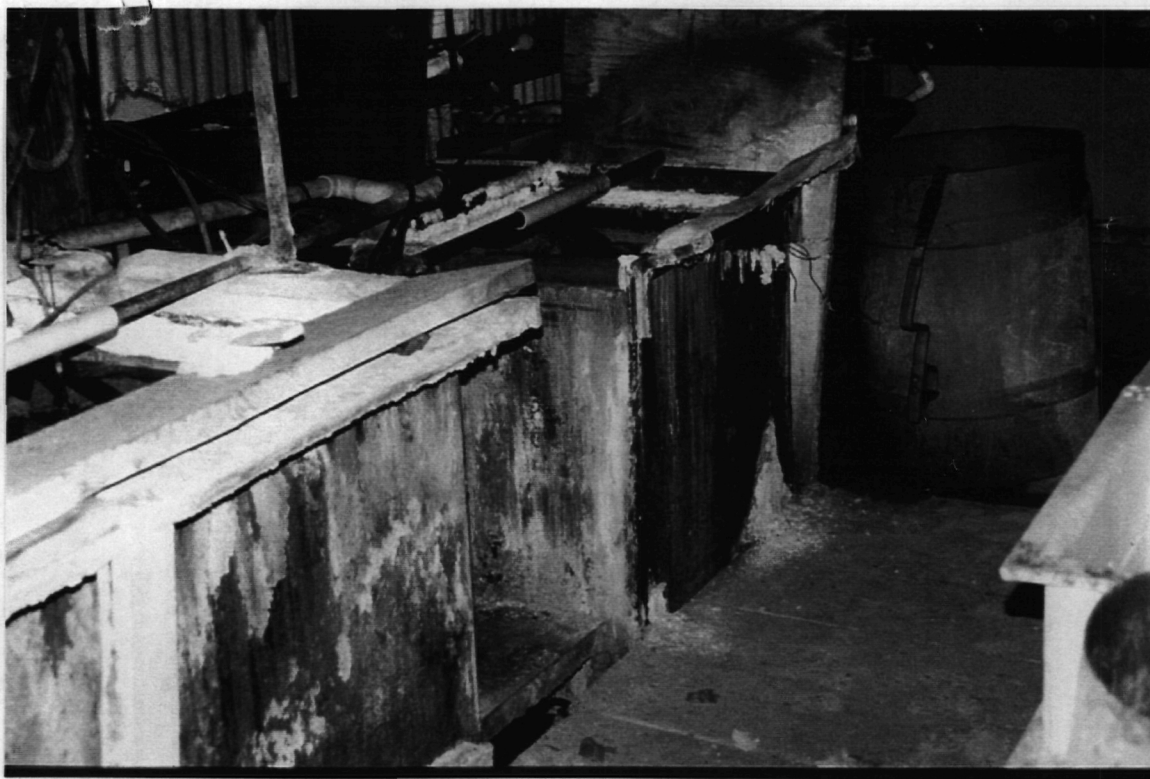
Date: 4/29/98



Pomona Plating Site Assessment  
Pomona, California

TDD: 099804-001

PAN: 0300PPSF-XX



Tanks located along north wall of main plating room, looking west.

Photographer: E. Hamrick

Date: 4/29/98



Supersacks containing filter cake from wastewater treatment area.

Photographer: E. Hamrick

Date: 4/29/98